201-14516

NCIC HPV
Sent by: Mary-Beth Weaver

06/03/2003 11:17 AM

To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on 2-Ethylhexyl Diphenyl Phosphate (CAS# 1241-94-7)

Richard_Denison@environmentaldefense.org on 05/28/2003 04:41:00 PM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, olsona@ferro.com
cc: lucierg@msn.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org

Subject: Environmental Defense comments on 2-Ethylhexyl Diphenyl Phosphate (CAS# 1241-94-7)

(Submitted via Internet 5/28/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and olsona@ferro.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2-Ethylhexyl Diphenyl Phosphate (CAS# 1241-94-7).

The test plan and robust summary for 2-ethylhexyl diphenyl phosphate (EDP) were prepared by Ferro Corporation. The test plan states that EDP is used as an all-purpose plasticizer for most commercial resins, including polyvinyl chloride and many of its copolymers such as cellulose nitrate and polystyrene. According to the sponsor, it is approved, apparently by FDA, for indirect food contact. No information is provided on potential human or environmental exposures, although there clearly is opportunity for these exposures given the use of EDP in a broad array of plastic products. The sponsor must have some information on the presence of EDP in consumer products, but has not provided it.

The sponsor states that no hazard information on EDP is available except for acute toxicity, and hence proposes studies to fulfill all other HPV endpoints. However, it does not appear that the sponsor has conducted an adequate literature survey based on statements found in the very short test plan. One statement in the test plan suggests that the current literature search has been quite cursory: "Ferro Corporation will continue to attempt to obtain adequate documentation on existing studies of EDP. To the extent that this information becomes available to Ferro, the HPV test plan submitted herein may be altered to reflect reliance on existing studies." This test plan, apparently, is merely an early progress report and should not be considered complete at this time.

We urge the sponsor to conduct as quickly as possible a thorough literature review and, based on the findings, resubmit a complete test plan for EDP. If there are indeed no available studies on EDP, then we agree that all of the proposed studies on EDP should be conducted. The acute toxicity study was reported in 1949 and it was not conducted according to GLP. However, in that study EDP did not exhibit any acute toxicity. Because of this and our view that, given the other studies to be performed, additional acute toxicity studies would not yield useful information, we agree with the sponsor that additional acute toxicity studies should not be conducted, in order to minimize the use of animals in fulfilling the requirements of the HPV program.

Thank you for this opportunity to comment.

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